

Introduction

The Aluminum Company of America (Alcoa), located in the town of Massena, NY was issued an administrative order (Consent Order) by the United States Environment Protection Agency (USEPA) Region 2, pursuant to Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended 42 USC section 9609, October 3, 1989. The USEPA, under Federal authority implements actions to clean up a hazardous waste site or, using its enforcement authority, require those responsible for the release to implement removal or remedial actions.

The St. Regis Mohawk Reservation (Reservation) is a Native American community and is located about 10 miles east of the ALCOA West facility. The release of hazardous substances from the ALCOA facility has impacted the resources of the Mohawks by contaminating fish and wildlife in the upstream area of the reservation. The St. Regis Mohawk Tribe (Tribe) has informed EPA that the facility and the site are located on Mohawk land claims territory and additionally have contaminated resources in areas within the land claims territory. The St. Regis Mohawk Tribe is the U.S. Federally recognized governmental body of the Mohawks and administers health, welfare and educational programs to its members.

The Tribe is seeking \$228,161.00 in support under the CERCLA Site Specific Support Agency Assistance program from the US Environmental Protection Agency (USEPA), Region 2 that will allow it to participate meaningfully in the remedial investigation/feasibility design activities at the ALCOA remedial site. The Tribe seeks funding for a 2-year period from November 15, 2010 – November 14, 2012.

The Tribe submits this proposed work plan and attached budget to USEPA, Region 2 in consideration of continuing funding for the Tribes participation in Site Specific activities at the ALCOA Superfund site while remediation occurs there.

Tribal Need

The Tribe has developed an Environment Division that manages its environmental affairs and concerns. The Environment Division has been responsible for implementing programs since the late 1980's and has continued to develop its personnel technical and administrative capabilities. The Environment Division currently provides site specific support and Tribal oversight of the Alcoa Superfund site, GM Superfund site remedial efforts and the Reynolds Superfund site with EPA Cooperative Site Specific Agreements and a non site specific Core grant program through EPA.

The Tribe desires to continue participation in the RI/FS activities relating to the ALCOA Grasse River site. The Tribe not only maintains an interest in the protection of the health and welfare of

its membership, but it has been acknowledged within the Alcoa consent order that the Mohawks have a significant role in the RI/FS and RD process.

The Tribe requests funding to support its activities related to the oversight and review of RI/FS documents, attend and participate in meetings and discussions with ALCOA and USEPA and manage administrative responsibilities relating to RI/FS activities. The Tribe requests funding to support the salary of a Tribal oversight specialist who will be responsible for representing the Tribe at meetings, review RI/FS documents and provide comments. This person will also be responsible for making site visits and inspections during RI/FS activities. Partial funding will provide program and administrative support. All of these tasks will ensure that the Tribes interests are met and communicated to ALCOA, USEPA and NYSDEC.

Proposed Work Plan

The USEPA, Region 2 Administrator ordered Alcoa to undertake remedial action at their facility because of the release of hazardous substances and their "imminent and substantial endangerment to the public health and welfare and to the environment" (United States Environmental Protection Agency, Region II, Administrative order Index No. II CERCLA-90229.) Under this order Alcoa was instructed to conduct a River and Sediment Investigation, develop a Risk Assessment, an Analysis of Alternatives, a Treatability Study, a Remedial Design and Remedial Action. Together these documents represent the process by which ALCOA will assess and remediate their release of hazardous substances through current engineering technologies and/or controls.

OBJECTIVE (1) - Attend meetings, review project plans, and comment.

TASKS	DUTIES INCLUDED	Year 1 (November 15, 2010 – November 14, 2011)	Year 2 November 15, 2011 – November 14, 2012
Task 1. Analysis of Alternatives (AofA) Development	<ul style="list-style-type: none"> • Final Document Review • Alternative Modeling, costing, and benefits development • 	416Hrs.	
Task 2. 2010 Nearshore Monitoring Data Summary Review	<ul style="list-style-type: none"> • Review Core Data • Review Report and provide comments • 	312Hrs.	
Task 3. Proposed Remedial Action Plan (PRAP) and Record of Decision (ROD).	<ul style="list-style-type: none"> • Review and provide comments • Consult with Tribal Council • Agency discussion and coordination • Consultant coordination • Internal discussion • Public meeting preparation and participation and follow up 	640Hrs	432 Hrs
Task 4. Attend Technical Team meetings	<ul style="list-style-type: none"> • Attend 6 technical team meetings per year in Albany or NYC • Meeting preparation and briefing of director and Tribal Council after each meeting • Travel time to each meeting and return 	192 Hrs.	192Hrs.
Task 5. Activated Carbon Pilot Study	<ul style="list-style-type: none"> • Vegetation Study • Monitoring Report Review/Comment • Additional Monitoring Proposal Review • Technical Team Meetings 	208 Hrs	208 Hrs
Task 6. Annual Monitoring	<ul style="list-style-type: none"> • Ice Formation and Break-up Monitoring by Tribal oversight specialist • Ice Monitoring Report Review • SRS Monitoring of PRP by Tribe oversight specialist (fish tissue, water column, etc.) 	208 Hrs	208 Hrs.
Task 7. Management	<ul style="list-style-type: none"> • Consultant Oversight • Semiannual progress reports • Administrative oversight 	208 Hrs.	208 Hrs.
	Total Projected Hours	2184Hrs	1248Hrs.

OBJECTIVE (2) – Direct and manage technical consultant.

Activities:	Date of Completion
1. Determine appropriateness and assign technical documents for review according to budget constraints.	November 2010-November 2012
2. Coordinate technical comments.	November 2010 – November 2012
3. Coordinate conference calls and meetings with consultant. Direct meetings attendance.	November 2010-November 2012
4. Review invoices and budget.	November 2010 – November 2012

OBJECTIVE (3) – Community Outreach

Outreach Activities:	Date of Completion
1. Radio Show Community Update (CKON 97.3 fm)	As Needed
2. Tribal Newsletter (SRMT Kawenni:ios/Good Words)	As Needed
3. Newspaper Press Releases (Indian Times)	As Needed

OBJECTIVE (4) – Travel and Training

TRAINING (2010-2011)	LOCATION	COSTS	DATES	NOTES:
1. Technical Team Meetings	Albany, NY	\$600/trip x 6= \$3,600	Quarterly	Winter travel via car, Spring/Summer Travel via CapeAir Flights
2. Battelle 6 th International Conference on Remediation of Contaminated Sediments Conference		\$2,500		Symposia typically includes Characterization, Sediment Processes and Modeling, Management and Policy, Treatment and Remediation, etc.
3. Conference/Training	TBD	\$1,250	TBD	(i.e. Annual Leadership Meetings, EPA Meetings, etc.)
4. Misc. Travel	NA	\$500	Oct.-Sept.	Field Oversight mileage
TRAINING (2011-2012)	LOCATION	COSTS	DATES	NOTES:
1. Technical Team	Albany, NY	\$600/trip	Quarterly	Winter travel via car,

Meetings		x 6= \$3,600		Spring/Summer Travel via CapeAir Flights
2. Sediment Management Work Group (SMWG) Conference	TBD	\$2,500		(i.e. training/conference recommended by RPM, etc.)
3. Misc. Travel	NA	\$500	Oct.-Sept.	Field Oversight mileage
TOTAL TRAVEL		\$14,450		2-year period (November 2010- November 2012)

OBJECTIVE (5) – Coordinate with Resource Agencies

Activities:	Date of Completion
1. Coordinate and consult with USEPA Superfund Project Manager	November 2010 – November 2012
2. Coordinate and consult with NYSDEC and NOAA	November 2010 – November 2012
3. Other resource agencies consultation for technical advice and expertise on related interdisciplinary sciences on the Grasse River Superfund Site.	November 2010 – November 2012

OBJECTIVE (6) – Administrative and fiscal oversight

Activities	Date of Completion
1. Administrative oversight of grant and work plan conditions and obligations	November 2010 – November 2012
2. Fiscal oversight of grant and work plan including contracts, procurement, accounting and reporting	November 2010 – November 2012

ALCOA OVERSIGHT	November 15, 2010- November 14, 2012)		
WAGES	\$ 112,920.00		
FRINGE	\$ 41,521.00		
CONTRACTUAL	\$ 16,000.00		
RENT	\$ 2,782.00		
TELEPHONE	\$ 240.00		
SUPPLIES	\$ 5,000.00		
POSTAGE	\$ 120.00		
INSURANCE			
ADVERTISING			
TRAVEL/TRAINING	\$ 14,450.00		
INDIRECT	\$ 32,628.00		
COMPUTER EQUIPMENT	\$ 2,500.00		
TOTAL	\$ 228,161.00		

Budget Narrative

The Environment Division will be responsible for recruiting and retaining an oversight specialist @\$53,661 (90%) annually who will manage the site specific activities related to the Alcoa site. Director @\$81,650 (10%) time is included in this amount as administrative support. The fringe is based on 36.77% of wages. The indirect rate is calculated as 18.46% of all direct costs. The Tribe also requires supplemental support for split sample analysis (\$1,000), and technical review by a qualified consultant.

A technical consultant (\$15,000) has been selected according to Federal and Tribal procurement requirements and this company, Spectra Environmental Group Inc., would be paid through this funding agreement. They will review and comment on documents, prepare reports on their recommendations, conduct field visits if necessary, attend meetings, and conduct site inspections as needed.

In order to effectively participate in the RI/FS processes including meetings conference calls, site inspections and other activities, it is necessary for the Tribe to provide the ALCOA site specific oversight specialist with basic and essential needs. These needs include office space, phone service, internet access, personal computer (PC), office supplies, copying, travel, training, mileage, personal protective equipment (PPE) and administrative/financial oversight and recordkeeping.